June 13, 2006

Mr. Mike Cote
Manager, Remediation Projects
Chemtura Corporation
199 Benson Road, MC# 2-4
Middlebury, CT 06749

Re: PCB Characterization - Phase II SB-71
GE Silicones, LLC Plant, Friendly, West Virginia

Dear Mike:

Environmental Strategies Consulting LLC, on behalf of Chemtura Corporation, has prepared a scope of work to address Phase II polychlorinated biphenyls (PCBs) characterization activities in the former Waste Incineration Area (SB-71) at the former Crompton OSi Specialties Group Sistersville facility, located at 3500 South State Route 2 near Friendly, Tyler County, West Virginia. The facility was acquired by General Electric Silicones, LLC (GE), on July 31, 2003, as part of the overall purchase of the OSi business from Chemtura.

In December 2005, Environmental Strategies conducted a Phase I PCB characterization to evaluate the areas identified by both the ENVIRON Phase II investigation completed May 2004 and post-excavation sampling performed in August 2005. The Phase I characterization was performed in accordance with the PCB Characterization Workplan prepared by Environmental Strategies dated November 2005, and the results were presented in the PCB Characterization Report prepared by Environmental Strategies dated May 2006.

During the Phase I characterization activities, Environmental Strategies confirmed that soil in the area surrounding SB-71 had PCB concentrations that exceeded the Toxic Substances Control Act (TSCA) self-implementing cleanup level for low occupancy areas of 25 milligrams per kilogram (mg/kg). The PCB concentrations for 35 of the 50 Phase I samples (surface and subsurface) collected from the grid around SB-71 exceeded the TSCA criterion. Based on the concentrations of PCBs detected in the SB-71 area, further delineation is warranted to identify the horizontal extent of soil containing PCBs at concentrations above the TSCA criterion.

In the SB-71 area, additional samples will be collected utilizing a sampling grid network that will extend beyond the limits of the original Phase I sampling grid to delineate the extent of PCBs in soil. The methods and procedures presented in the PCB Characterization Workplan prepared by Environmental Strategies, dated November 2005, will be followed to conduct the activities associated with this scope of work.

Scope of Work

The proposed grid pattern for the SB-71 area is shown on Figure 1, with sampling locations at 25-foot grid intersections (versus the 15-foot grid in Phase I). Based on the previous sampling results, at this time a larger grid-intersection length is recommended to delineate the potentially affected soil in the SB-71 area. A total of 16 locations will be sampled from the intersection points located adjacent to the Phase I sampling locations. These samples will be designated as primary sample locations. Samples collected at the edge or corner of the grid will be designated as secondary sample locations. Using the same approach as in the Phase I, samples will be collected from each grid point from 0 to 0.5 feet beneath surface cover or gravel, if present, using direct-push technology. An additional sample from each location will be collected from 0.5 to 1.5 feet below the surface sample. The primary samples will be submitted to the laboratory to be analyzed immediately. The secondary samples will be submitted to the laboratory, the initial extraction will be completed, and the samples will be archived pending the results of the primary samples.

As in Phase I, field conditions may require modification of the sampling point locations. A valid grid intersection sampling point will be defined as located on soil (including gravel) or asphalt. Each sample location that is covered by concrete slab or steel plating, or where other access restrictions prohibit sampling, will be considered an invalid sampling location. However, if an invalid grid intersection point is within approximately two feet of a valid sampling point, the location will be modified by moving to the nearest valid sampling point.

The SB-71 Phase II soil samples will be submitted for laboratory analysis of PCBs by EPA Method SW-846 8082, and approximately 25 percent of the samples will also be analyzed for total organic carbon (TOC). In addition, five percent of the samples will be collected as blind duplicate samples, and will be submitted for laboratory analysis for quality assurance/quality control (QA/QC) purposes. A field blank sample will be collected at a rate of one per day. The samples will be analyzed by a West Virginia certified laboratory.

Based on the analytical results for the primary samples, the secondary samples may be analyzed using the same analytical method as the primary samples. If a primary sample has a PCB concentration that exceeds the TSCA criterion, any adjacent secondary samples will be submitted for laboratory analysis. The secondary samples will also be analyzed for TOC and QA/QC purposes at the same frequency as the primary samples.

Before initiating field activities, a site-specific Health and Safety Plan will be prepared by Environmental Strategies in accordance with 29 CFR 1910.120. All personnel involved in field activities will be required to have OSHA 40-hour training (and updated refresher training), and to have background checks as required by GE contractor procedures.

Environmental Strategies will evaluate the results of the SB-71 Phase II soil characterization activities, including the analytical results of the primary and any secondary samples submitted for laboratory analysis. If the analytical results indicate that the TSCA criterion is not exceeded in any of the soil samples analyzed, Environmental Strategies will recommend documenting the

activities completed during this phase of the PCB characterization project, including characterization of the sample locations, sampling results, and data quality assurance review, in a summary report. If the sample analytical results indicate that the TSCA criterion was exceeded, Environmental Strategies will make recommendations for additional investigation activities or a remedial action, if warranted.

Schedule

The proposed schedule for completing this scope of work is based on our current understanding of the logistical requirements of the GE facility. The initiation of the field sampling program is contingent on GE's clearance of the utilities. Field sampling of the SB-71 area will be completed within six weeks of the completion of background checks as required by GE contractor procedures. This time period includes setting up the grid pattern for SB-71 in the field, and final utility clearance by GE of the proposed locations for all sampling areas on the first day of the field sampling program. Primary sample results for the SB-71 area are expected within three weeks of submittal for laboratory analysis based on a standard turnaround time of 15 business days. If secondary samples are submitted for analysis, this time period will be extended. Data evaluation and recommendations will be completed within two weeks of the receipt of either final primary or secondary sampling results.

Environmental Strategies is pleased to have the opportunity to provide continuing environmental consulting services for Chemtura. If you have any questions or comments regarding this scope of work, please do not hesitate to contact us.

Sincerely yours,

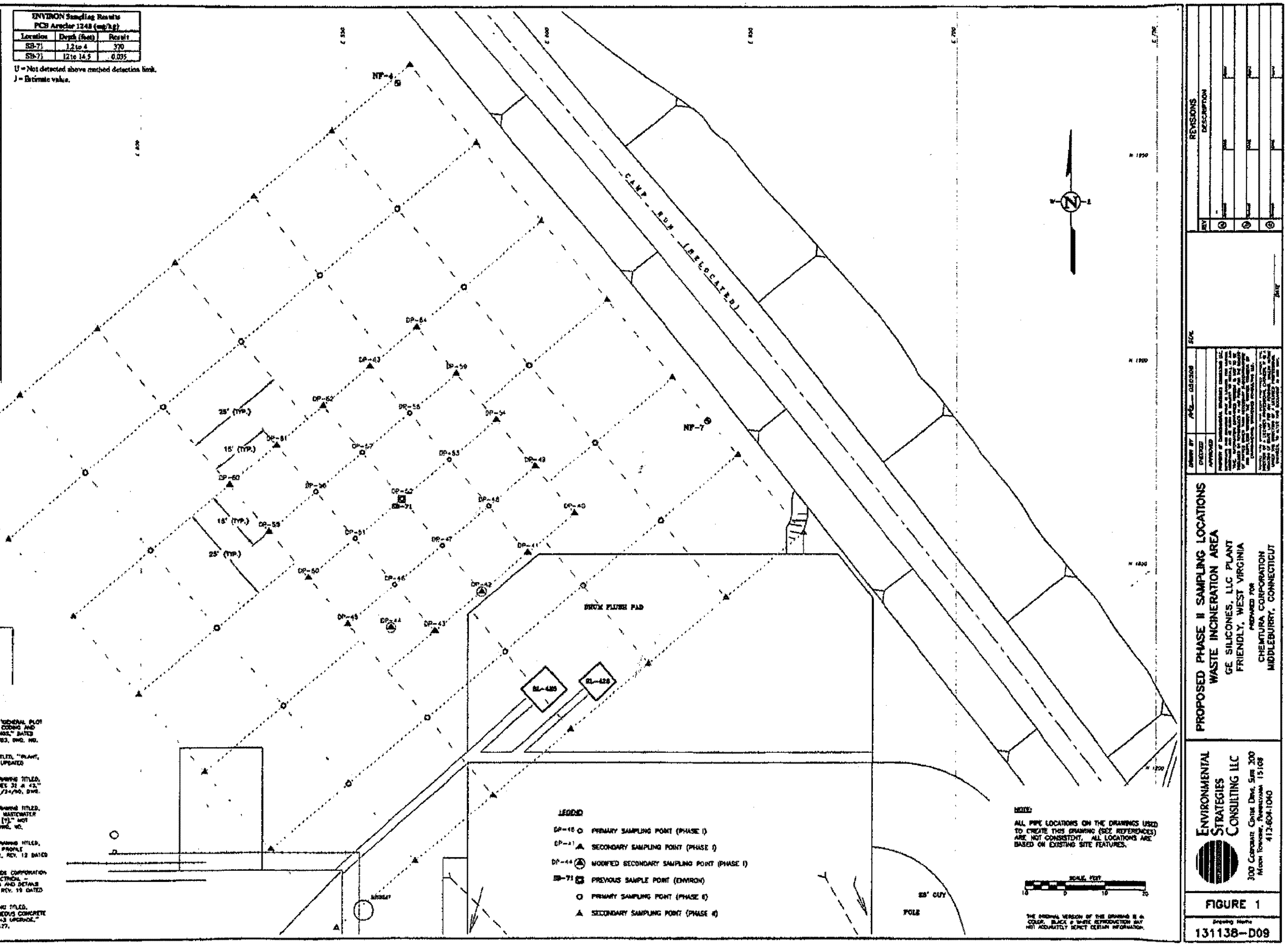
Thomas M. Biksey
Director Risk Assessment

Figure

Phase I SB-71 Sampling Grid Results PCB Aroclor 1248 (mg/kg)		
	Sample Interval (below ground surface)	
Location	3" to 6"	6" to 18"
DP-40	41	210
DP-41	13	16
DP-42	52	51
DP-43	8.6	6.5
DP-44	61	46
DP-45	8.3	6
DP-46	0.83	37
DP-47	6.1	28
DP-48	25	43
DP-49	47	53
DP-50	94	25
DP-51	19	61
DP-52	34	78
DP-53	93	71
DP-54	240	280
DP-55	28	64
DP-56	120	57
DP-57	26	14
DP-58	18	140
DP-59	62	120
DP-60	200	30
DP-61	130	63
DP-62	28	590
DP-63	35	3.5
DP-64	28	2.1

ENVIRON Sampling Results PCB Aroclor 1248 (mg/kg)		
Location	Depth (feet)	Result
SB-71	1.2 to 4	370
SB-71	12 to 14.5	0.035

U = Not detected above method detection limit.
J = Estimate value.



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